

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

LISSETTE LARIOS ROOHBAKHSH, as
personal representative of the ESTATE
OF FATIMA LISSETTE LARIOS and on
behalf of next of kin,

Case No. 8:17-cv-00031

and

NELSON LARIOS, as next of kin,

DECLARATION OF ROBERT STACK

Plaintiffs,

v.

BOARD OF TRUSTEES OF THE
NEBRASKA STATE COLLEGES,

and

CHADRON STATE COLLEGE,

Defendants.

I, Robert Stack, hereby depose and state as follows:

1. I am over 21 years old and have personal knowledge of the matters set forth in this declaration.

2. Chadron State College ("CSC") has employed me from 1988 to the current time. I am currently a Mathematical Sciences Professor at CSC. During my time at CSC, I have also held the position of Assistant Professor, Dean of Students, and CSC Head Softball Coach. More specifically, I was the CSC Head Softball Coach from 2007-2017.

3. Exhibit 47 is a true and correct copy of handwritten notes taken during my October 25, 2014 meeting with Fatima Larios.

EXHIBIT 55

4. Exhibit 48 is a true and correct copy of Fatima Larios' March 6, 2014 email to me.

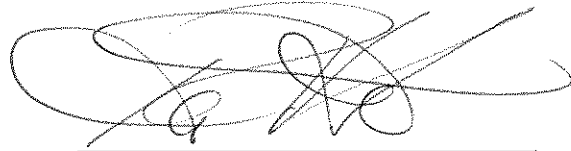
5. Exhibit 52 is a true and correct copy of the January 21, 2015 text messages I exchanged with Fatima Larios.

6. Chadron State College athletes compete at the National Collegiate Athletic Association's Division II level.

7. After practices resumed in January 2015, I did not personally observe or hear of any concerns regarding Larios' behavior.

[Remainder of page intentionally left blank]

I declare under penalty of perjury that the foregoing is true and correct. Executed on
this 11th day of February, 2019.

A handwritten signature in black ink, appearing to be 'Robert Stack', written over a horizontal line.

Robert Stack, Chadron State College